

## REMARKS

Claims 1-13, 15-17 and 20-27 are presently pending in the application. Claims 1-27 are rejected. Claims 1, 13 and 21 have been amended. Claims 14, 18 and 19 have been cancelled.

Reconsideration of the objections and rejections set forth in the aforementioned Office Action is respectfully requested in view of the following remarks. The basis for the amendments can be found throughout the Specification, Claims and Drawings as originally filed.

### REJECTION UNDER 35 U.S.C. § 102

Claims 1-3, 5, 8 and 10-12 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Tani (US 6,234,080) or Meissner (US 6,321,760).

The Applicants have amended claim 1 to note that the chamber is selectively moveable in a direction substantially parallel to the ground from a first position clear of the part to a second position engaging the stand. The Applicants respectfully submit that neither Tani nor Meissner disclose an industrial parts washer as defined by amended claim. On the contrary, Tani discloses vertically moveable chamber halves. Furthermore, Tani does not disclose a chamber forming a sealed volume encapsulating the part when the chamber is in the second position. As clearly depicted in Figures 1 and 2 of Tani, screen 2 extends from either side of upper and lower cleaning chambers 4,5. Upper cleaning chamber 4 creates a sealed contact with upper surface 2A of screen 2 while lower cleaning chamber 5 may be raised to create a sealed contact with lower surface 2B of screen 2 (Col. 4, lines 48-56). Screen 2 extends outside of the sealed volume formed by the upper and lower chambers of Tani. Accordingly, the

Applicants respectfully submit that Tani does not disclose each and every element of amended claim 1.

The Applicants also respectfully submit that Meissner does not disclose each and every element of amended claim 1. On the contrary, Meissner discloses processing chamber 8 having an upper part 26 and a lower part 13. Upper part 26 is fastened to a projecting arm 37 of a lifting device 38 operable to move upper part 26 vertically relative to the ground in order to move upper part 26 to a position clear of workpiece 1. As previously mentioned, amended claim 1 notes that the chamber is selectively moveable in a direction substantially parallel to the ground from a first position clear of the part to a second position engaging a stand. The Applicants respectfully submit that Meissner does not disclose each and every element of amended claim 1 and respectfully request the Examiner to withdraw the § 102 rejections to claims 1-3, 5, 8 and 10-12.

#### **REJECTION UNDER 35 U.S.C. § 103**

Claims 4, 6 and 7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over either Tani or Meissner in view of either Kramer (US 5,000,206) or EPO 0 452 285. Claim 9 is rejected under 35 U.S.C. § 103(a) as being unpatentable over either Tani or Meissner in view of Gentry (US 4,170,240).

The Applicants respectfully rely on the comments and amendments previously set forth relating to claim 1. Because claims 4, 6, 7 and 9 depend from claim 1, the Applicants respectfully submit that claims 4, 6, 7 and 9 are not obvious in view of any of the references cited either solely or in combination with one another. Accordingly, the

Applicants respectfully request withdrawal of the § 103 rejections to claims 4, 6, 7 and 9.

Claims 13-27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over either Tani or Meissner in view of either Gentry or Kramer et al.

The Applicants have amended claim 13 to include the limitations of previously pending claims 18 and 19. Accordingly, the Applicants respectfully submit that amended claim 13 is merely claim 19 rewritten in independent form. As such, the claim has not been amended for reasons related to patentability but simply to expedite patent prosecution.

Amended claim 13 and originally pending claims 18 and 19 call for an industrial parts washer having a first chamber cantilever mounted on a slide moveable relative to the first parts stand wherein the slide includes a base portion positioned offset from and beneath the first chamber. A portion of a lift assembly is positioned between the base portion and the first chamber. The Applicants respectfully submit that none of the references cited by the Examiner, either solely or in combination with one another, teach or suggest an industrial parts washing station as defined by amended claim 13. While Kramer et al. may disclose a cantilevered workpiece holder 18, amended claim 13 relates to the first chamber being cantilever mounted on a slide moveable relative to the first parts stand. Workpiece holder 18 of Kramer et al. is axially moveable in the direction of the double headed arrow shown in Figure 1 but chamber 10 is not.

Regarding the remaining references cited, an industrial parts washing station is not taught or suggested that includes a first chamber selectively moveable from a first position allowing access to the first frame to a second position to enclose the first fame

where the industrial parts washing station includes a lift assembly operable to transfer the part from the first frame to the second frame when the first and second chambers are in the first position wherein the first chamber is cantilever mounted on a slide moveable relative to the first part stand and wherein the slide includes a base portion positioned offset from and beneath the first chamber where a portion of the lift assembly is positioned between the base portion and the first chamber. Accordingly, the Applicants respectfully request withdrawal of the § 103 rejections to claims 13, 15-17 and 20.

Regarding the § 103 rejections to claims 21-27, the Applicants have amended claim 21 to note that the industrial parts washer includes a horizontally slidable chamber selectively moveable between a first position clear of the part and a second position where the chamber substantially encloses the part. The Applicants respectfully submit that none of the references cited, either solely or in combination with one another, teach or suggest an industrial parts washer as defined by amended claim 21. On the contrary, the references cited provide either non-moveable chambers or vertically moveable chamber portions but not a horizontally slidable chamber selectively moveable between a first position clear of the part and second position where the chamber substantially encloses the part in combination with the other elements of claim 21. Accordingly, the Applicants respectfully request withdrawal of the § 103 rejections to claims 21-27.

#### **CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request

that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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